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AB

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

239

UNITED STATES OF AMERICA

v.

BRIAN KEITH BAILEY,
a/k/a "Keith,"
RUBEN RIVERA,
GILBERTO HERNANDEZ,
a/k/a "Papo,"
HENRY SANTANA,
a/k/a "Henry Santo,"
a/k/a "Henry Sabana,"
MOHAMED DONADO,
a/k/a "Mo,"
RENEE HOPE HERRERA
MICHAEL DI QUATTRO
RICARDO SANTIAGO,
a/k/a "Bambe,"
ENCARNACION TORRES
EDWIN CRUZ
JUAN AMADOR,
a/k/a "Johnny,"
WILLIAM KING
MIGUEL BERDECIA,
a/k/a "Colombia,"
YOLANDA COLON,
ROBERTO CARMONA,
a/k/a "Anthony,"
FRANCISCO NUNEZ,
a/k/a "Paquito,"
SHARON BAILEY,
CARLOS REGALADO ROSA,
a/k/a "Orlando Santana,"
ALFREDO AVILES,
a/k/a "June,"
OSUALDO ORTIZ,
a/k/a "Cano,"
AMELED DONADO,
NORMA SANTELL

: CRIMINAL NO. 99-631-1

: DATE FILED: 12-22-99

: VIOLATIONS:

: 21 U.S.C. § 846

: (Conspiracy to distribute marijuana - 1 Count)

: 21 U.S.C. §841(a)(1)

: (Possession and attempted possession of

: marijuana with intent to distribute - 9 Counts)

: 21 U.S.C. §860

: (Drug offenses in protected zone - 9 Counts)

: 21 U.S.C. §856(a)(2)

: (Making building available for marijuana

: distribution activity - 4 Counts)

: 18 U.S.C. §924(c)(Possession of a firearm in

: furtherance of a drug trafficking crime- 2 Counts)

: 18 U.S.C. §922(g)(1)(Possession of firearm by a

: convicted felon - 1 Count)

: 18 U.S.C. §2 (Aiding and abetting)

: 21 U.S.C. §853 (Notice of forfeiture)

FILED

DEC 22 1999

MICHAEL E. KUNZ, Clerk

By CMC Dep. Clerk

SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

From at least in or around January 1990, through on or about September 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, defendants

**BRIAN KEITH BAILEY,
a/k/a "Keith,"
RUBEN RIVERA,
GILBERTO HERNANDEZ,
a/k/a "Papo,"
HENRY SANTANA,
a/k/a "Henry Santo,"
a/k/a "Henry Sabana,
MOHAMED DONADO,
a/k/a "Mo,"
RENEE HOPE HERRERA,
MICHAEL DI QUATTRO
RICARDO SANTIAGO,
a/k/a "Bambe,"
ENCARNACION TORRES,
EDWIN CRUZ,
JUAN AMADOR,
a/k/a "Johnny,"
WILLIAM KING
MIGUEL BERDECIA,
a/k/a "Colombia,"
YOLANDA COLON,
ROBERTO CARMONA,
a/k/a "Anthony,"
FRANCISCO NUNEZ,
a/k/a "Paquito,"
SHARON BAILEY,
CARLOS REGALADO ROSA,
a/k/a "Orlando Santana,"
ALFREDO AVILES,
a/k/a "June,"
OSUALDO ORTIZ,
a/k/a "Cano,"
AMELED DONADO, and
NORMA SANTELL,**

knowingly and intentionally conspired and agreed, together and with persons known and unknown to the grand jury, to manufacture, distribute and to possess with intent to distribute more than 1,000 kilograms of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and to manufacture, distribute and to possess with intent to distribute more than 1,000 kilograms of marijuana, a Schedule I controlled substance, within 1000 feet of the real property comprising the Alexander K. McClure Elementary School, a public elementary school, located at 600 West Hunting Park Avenue in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 860.

MANNER AND MEANS

1. It was part of the conspiracy that, from about 1990 through about 1992, defendants BRIAN KEITH BAILEY, a/k/a "Keith," RUBEN RIVERA, and GILBERTO HERNANDEZ, a/k/a "Papo," owned and managed a street level marijuana distribution organization (The "Bailey Organization") on the 4000 block of North Fairhill Street in Philadelphia, Pennsylvania ("the block") and shared in the profits from the marijuana sales.

It was further part of the conspiracy that:

2. From about 1992 through the present, after GILBERTO HERNANDEZ, a/k/a "Papo," ceased functioning as an owner and manager of the Bailey Organization, defendants BRIAN KEITH BAILEY, a/k/a "Keith," and RUBEN RIVERA owned and managed the Bailey Organization and shared in the profits from the marijuana sales.

3. The Bailey Organization distributed small packages of marijuana which sold for \$5.00 each on the block every day from about 8:00 a.m. until at least midnight. Street sellers working for the Bailey Organization sold the packages of marijuana to customers who generally drove to the block and made their purchases from their cars, and occasionally to customers who

walked to the block.

4. The Bailey Organization obtained marijuana in multi-kilogram quantities packaged in bulk form inside large cardboard boxes which was stored in various storage locations, including 5209 Akron Street in Philadelphia, Pennsylvania.

5. The Bailey Organization cut and packaged the bulk quantities of marijuana into smaller quantities which were ultimately delivered to locations where the marijuana was further cut and packaged for street sales. The Bailey Organization engaged in this packaging activity at various locations, including 208 West Laurel Street, 5605 North 4th Street, 610 Lindley Avenue, and 5869 North Marshall Street in Philadelphia, Pennsylvania.

6. The Bailey Organization transported the cut and packaged marijuana in large dark-colored trash bags from the packaging locations to a number of different storage locations, including 439 East Rockland Street in Philadelphia, Pennsylvania.

7. The Bailey Organization transported the cut and packaged marijuana in smaller plastic trash bags from the storage locations, including 439 East Rockland Street in Philadelphia, Pennsylvania, to the block for street sales.

8. Defendant HENRY SANTANA, a/k/a "Henry Sabana," obtained multi-kilogram quantities of marijuana, and along with defendants GILBERTO HERNANDEZ, a/k/a "Papo" (after 1992), and MOHAMED DONADO, a/k/a "Mo," supplied multi-kilogram quantities of marijuana to defendants BRIAN KEITH BAILEY, a/k/a "Keith," and RUBEN RIVERA for the Bailey Organization to distribute on the block.

9. Defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," obtained the multi-kilogram quantities of marijuana that he supplied to the Bailey Organization and others known and unknown to the grand jury from sources in Arizona and elsewhere.

10. Defendants RENEE HOPE HERRERA and MICHAEL DI QUATTRO worked for defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," and transported multi-kilogram quantities of marijuana from Arizona to defendant HENRY SANTANA and his associates GILBERTO HERNANDEZ, a/k/a "Papo," MOHAMED DONADO, a/k/a "Mo," and others both known and unknown to the grand jury, in Philadelphia.

11. Defendant NORMA SANTELL stored multi-kilogram quantities of marijuana for defendant MOHAMED DONADO, a/k/a "Mo," to be supplied to defendants BRIAN KEITH BAILEY, a/k/a "Keith," and RUBEN RIVERA for the Bailey Organization to distribute on the block.

12. Defendants JUAN AMADOR, a/k/a "Johnny," RICARDO SANTIAGO, a/k/a "Bambe," ENCARNACION TORRES, WILLIAM KING and others known and unknown to the grand jury, transported multi-kilogram quantities of marijuana to and from various packaging and storage locations in Philadelphia, Pennsylvania and to the block for street level distribution by the Bailey Organization.

13. Defendants RICARDO SANTIAGO, a/k/a "Bambe," MIGUEL BERDECIA, a/k/a "Colombia," EDWIN CRUZ, and JUAN AMADOR, a/k/a "Johnny," managed the marijuana sales activity on the block for the Bailey Organization by distributing marijuana to street sellers and collecting the proceeds from the sales.

14. Defendants YOLANDA COLON, FRANCISCO NUNEZ, a/k/a "Paquito," ROBERTO CARMONA, a/k/a "Anthony," SHARON LEE BAILEY, ALFREDO AVILES, a/k/a "June," CARLOS REGALADO ROSA, a/k/a "Orlando Santana," and others known and unknown to the grand jury, worked for the Bailey Organization by cutting and packaging the marijuana for street sales on the block.

15. Defendant YOLANDA COLON supervised the individuals who cut and packaged the marijuana for street sales on the block.

16. At the direction of defendants BRIAN KEITH BAILEY, a/k/a "Keith," and RUBEN RIVERA, defendant OSUALDO ORTIZ, a/k/a "Cano," stored marijuana in his residence at 208 West Laurel Street in Philadelphia, Pennsylvania, where he would protect it before it was cut and packaged for distribution on the block. OSUALDO ORTIZ also destroyed evidence of the Bailey Organization's marijuana packaging operation by transporting such evidence from his residence to a private trash truck at 4000 North 5th Street in Philadelphia, Pennsylvania, the location of the New Dutch Garden Bar, owned by defendant BRIAN KEITH BAILEY.

17. Defendant BRIAN KEITH BAILEY, a/k/a "Keith," purchased real estate in the Eastern District of Pennsylvania with the proceeds of his illegal marijuana distribution operation in a manner designed to conceal the nature, source, and ownership of such illegal drug proceeds.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, the following overt acts were committed in the Eastern District of Pennsylvania and elsewhere:

1. In or around 1990, defendants BRIAN KEITH BAILEY, a/k/a "Keith," RUBEN RIVERA, and GILBERTO HERNANDEZ, a/k/a "Papo," took over the marijuana distribution operation on the 4000 block of North Fairhill Street in Philadelphia, Pennsylvania, from C. C.

2. On or about August 24, 1993, defendant BRIAN KEITH BAILEY, a/k/a "Keith," purchased a house at 6916 North 19th Street in Philadelphia, Pennsylvania, for about

\$89,000, with the proceeds of his illegal marijuana distribution operation in a manner designed to conceal the nature, source, and ownership of such illegal drug proceeds.

3. On or about February 17, 1995, defendant BRIAN KEITH BAILEY, a/k/a "Keith," purchased a house at 1117 Rock Creek Drive, in Wyncote, Pennsylvania, for about \$155,000.00 with the proceeds of his illegal marijuana distribution operation in a manner designed to conceal the nature, source, and ownership of such illegal drug proceeds.

4. In or around late 1995, defendant BRIAN KEITH BAILEY, a/k/a "Keith," purchased a house at 1462 Thornberry Road, in Wyncote, Pennsylvania, for about \$150,000.00 with the proceeds of his illegal marijuana distribution operation in a manner designed to conceal the nature, source, and ownership of such illegal drug proceeds.

5. On or about June 4, 1997, RENEE HOPE HERRERA possessed \$10,000 in United States currency in her carry-on bag at Philadelphia International Airport. This currency was proceeds of her illegal trafficking in marijuana for defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," and others known and unknown to the grand jury.

6. On or about August 22, 1997, defendant BRIAN KEITH BAILEY, a/k/a "Keith," purchased the New Dutch Garden Bar at 4000 North 5th Street in Philadelphia, Pennsylvania, for about \$190,000.00 with the proceeds of his illegal marijuana distribution operation in a manner designed to conceal the nature, source, and ownership of such illegal drug proceeds.

7. On or about December 16, 1997, defendant BRIAN KEITH BAILEY, a/k/a "Keith," purchased a house at 1 Latham Parkway in Cheltenham, Pennsylvania, for about \$240,000.00 with the proceeds of his illegal marijuana distribution operation in a manner designed to conceal the nature, source, and ownership of such illegal drug proceeds.

8. On or about March 27, 1998, defendant BRIAN KEITH BAILEY, a/k/a "Keith," possessed inside his residence at 1 Latham Parkway, Cheltenham, Pennsylvania, multiple bundles of United States currency that were proceeds of his drug distribution business.

9. On or about June 17, 1998, defendants RENEE HOPE HERRERA and MICHAEL DI QUATTRO transported about 1,296 pounds of marijuana from Tucson, Arizona, for distribution to defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," the Bailey Organization, and others both known and unknown to the grand jury. HERRERA and DI QUATTRO transported the marijuana until police stopped them in Nashville, Tennessee, and seized the marijuana they were transporting.

10. On or about June 17, 1998, defendants RENEE HOPE HERRERA and MICHAEL DI QUATTRO possessed loaded firearms in furtherance of their narcotics trafficking activities to protect the marijuana they were transporting for defendant, HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," the Bailey Organization, and others both known and unknown to the grand jury; that is, defendants RENEE HOPE HERRERA and MICHAEL DI QUATTRO possessed a loaded Glock Model 19, 9 millimeter semi-automatic pistol (serial number CGR221); a loaded Glock Model 21, .45 caliber pistol (serial number ALY992) with two magazines of ammunition; and a loaded Research Desert Eagle .50 caliber semi-automatic pistol (serial number 95207890) with a laser sight and scope.

11. On or about February 16, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," CARLOS REGALADO ROSA, a/k/a "Orlando Santana," SHARON LEE BAILEY, and ALFREDO AVILES, a/k/a "June," traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

12. On or about March 19, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," CARLOS REGALADO ROSA, a/k/a "Orlando Santana," and ALFREDO AVILES, a/k/a "June," traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

13. In or about March or April 1999, defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," directed T.L. to transport about 500 pounds of marijuana from Tuscon, Arizona to Philadelphia for distribution to the Bailey organization and others both known and unknown to the grand jury. T.L. agreed and transported the marijuana to Philadelphia for SANTANA in his tractor trailer.

14. When T.L. arrived in Philadelphia, he was met by defendant MOHAMED DONADO, a/k/a "Mo," who transferred the marijuana from the tractor-trailer to a Budget moving truck, and distributed the marijuana to the Bailey organization and others both known and unknown to the grand jury.

15. The next day, T.L. met defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," outside a market at 22nd Street and Lehigh Avenue in Philadelphia where SANTANA paid T.L. \$7,000 in United States currency for transporting the marijuana.

16. On or about May 5, 1999, defendant ENCARNACION TORRES removed a large dark-colored trash bag containing cut and packaged marijuana from 208 West Laurel Street in Philadelphia, Pennsylvania, and transported it to 439 East Rockland Street in Philadelphia, Pennsylvania, the residence of defendant RICARDO SANTIAGO, a/k/a "Bambe," where it was stored for distribution on the block.

17. On or about May 6, 1999, defendant ENCARNACION TORRES traveled to

208 West Laurel Street in Philadelphia, Pennsylvania, where he retrieved a large dark-colored trash bag containing cut and packaged marijuana and transported it to 439 East Rockland Street in Philadelphia, Pennsylvania, the residence of defendant RICARDO SANTIAGO, a/k/a "Bambe," where it was stored for distribution on the block.

18. On or about May 10, 1999, defendant JUAN AMADOR, a/k/a "Johnny," traveled to 439 East Rockland Street in Philadelphia, Pennsylvania, the residence of defendant RICARDO SANTIAGO, a/k/a "Bambe," where he retrieved a smaller plastic trash bag of cut and packaged marijuana from an automobile operated by defendant RICARDO SANTIAGO. Defendants JUAN AMADOR, a/k/a "Johnny," and RICARDO SANTIAGO then transported the smaller plastic trash bag of cut and packaged marijuana to 4047 North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

19. On or about May 11, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," CARLOS REGALADO ROSA, a/k/a "Orlando Santana," SHARON LEE BAILEY, and ALFREDO AVILES, a/k/a "June," traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

20. On or about May 11, 1999, defendant RICARDO SANTIAGO, a/k/a "Bambe," transported one or more smaller plastic trash bags of cut and packaged marijuana from his residence at 439 East Rockland Street in Philadelphia, Pennsylvania, to the 4000 block of North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

21. On or about May 11, 1999, defendant MIGUEL BERDECIA, a/k/a "Colombia," retrieved one or more smaller plastic trash bags of cut and packaged marijuana from the vehicle in which defendant RICARDO SANTIAGO, a/k/a "Bambe," had transported

the marijuana from his residence at 439 East Rockland Street in Philadelphia, Pennsylvania, and carried them inside 4047 North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

22. On or about May 14, 1999, defendant RICARDO SANTIAGO, a/k/a "Bambe," transported one or more smaller plastic trash bags of cut and packaged marijuana from his residence at 439 East Rockland Street in Philadelphia, Pennsylvania, to the 4000 block of North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

23. On or about May 14, 1999, defendant MIGUEL BERDECIA, a/k/a "Colombia," retrieved one or more smaller plastic trash bags of cut and packaged marijuana from the vehicle in which defendant RICARDO SANTIAGO, a/k/a "Bambe," had transported the marijuana from his residence at 439 East Rockland Street in Philadelphia, Pennsylvania, and carried them inside 4047 North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

24. On or about May 17, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," CARLOS REGALADO ROSA, a/k/a "Orlando Santana," SHARON LEE BAILEY, and ALFREDO AVILES, a/k/a "June," traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

25. On or about May 17, 1999, defendants RICARDO SANTIAGO, a/k/a "Bambe," and JUAN AMADOR, a/k/a "Johnny," traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where they retrieved a large dark-colored trash bag of cut and packaged marijuana and transported it directly to 4047 North Fairhill Street in Philadelphia, Pennsylvania, for street sales on the block.

26. On or about May 20, 1999, defendants RICARDO SANTIAGO, a/k/a "Bambe," and JUAN AMADOR, a/k/a "Johnny," transported a smaller plastic trash bag of cut and packaged marijuana from 439 East Rockland Street in Philadelphia, Pennsylvania, the residence of defendant RICARDO SANTIAGO, to 4047 North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

27. On or about May 24, 1999, defendants RICARDO SANTIAGO, a/k/a "Bambe," and ENCARNACION TORRES transported a smaller plastic trash bag of marijuana from 439 East Rockland Street in Philadelphia, Pennsylvania, the residence of defendant RICARDO SANTIAGO, to the 4000 block of North Fairhill Street in Philadelphia, Pennsylvania, for distribution on the block.

28. On or about June 8, 1999, defendant ENCARNACION TORRES traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where he retrieved a large dark-colored trash bag of marijuana and transported it to 439 East Rockland Street in Philadelphia, Pennsylvania, the residence of defendant RICARDO SANTIAGO, a/k/a "Bambe," where it was stored for distribution on the block.

29. On or about June 11, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," CARLOS REGALADO ROSA, a/k/a "Orlando Santana," SHARON LEE BAILEY, and ALFREDO AVILES, a/k/a "June," traveled to 208 West Laurel Street in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

30. On or about June 14, 1999, defendant OSUALDO ORTIZ, a/k/a "Cano," destroyed evidence of the Bailey Organization's marijuana packaging operation by transporting such evidence from his residence at 208 West Laurel Street in Philadelphia, Pennsylvania, to a

private trash truck at 4000 North 5th Street in Philadelphia, Pennsylvania, the location of the New Dutch Garden Bar, owned by defendant BRIAN KEITH BAILEY, a/k/a "Keith."

31. On or about June 17, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Pacquito," and CARLOS REGALADO ROSA, a/k/a "Orlando Santana," traveled to 5605 North 4th Street in Philadelphia, Pennsylvania, where defendant RUBEN RIVERA admitted them to the property where they cut and packaged marijuana for street sales on the block.

32. On or about June 18, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Pacquito," and CARLOS REGALADO ROSA, a/k/a "Orlando Santana," traveled to 5605 North 4th Street in Philadelphia, Pennsylvania, where defendant RUBEN RIVERA admitted them to the property where they cut and packaged marijuana for street sales on the block.

33. On or about June 22, 1999, defendant RUBEN RIVERA traveled to 5605 North 4th Street in Philadelphia, Pennsylvania, where he retrieved a large duffel bag of marijuana.

34. On or about June 28, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Pacquito," ALFREDO AVILES, a/k/a "June," and CARLOS REGALADO ROSA, a/k/a "Orlando Santana," traveled to 5605 North 4th Street in Philadelphia, Pennsylvania, where defendant RUBEN RIVERA admitted them to the property where they cut and packaged marijuana for street sales on the block.

35. On or about June 30, 1999, defendant RUBEN RIVERA traveled to 5605 North 4th Street in Philadelphia, Pennsylvania, where he retrieved two large dark-colored trash bags of marijuana and delivered them to defendant RICARDO SANTIAGO, a/k/a "Bambe," at

3644-48 North Lawrence Street in Philadelphia, Pennsylvania, for distribution on the block.

36. On or about July 1, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," ALFREDO AVILES, a/k/a "June," and CARLOS REGALADO ROSA, a/k/a "Orlando Santana," traveled to 5605 North 4th Street in Philadelphia, Pennsylvania, where defendant RUBEN RIVERA admitted them to the property where they cut and packaged marijuana for street sales on the block.

37. On or about August 4, 1999, defendant RUBEN RIVERA met with defendant GILBERTO HERNANDEZ, a/k/a "Papo," on the 3600 block of Lawrence Street in Philadelphia, Pennsylvania, where defendant RUBEN RIVERA inspected the marijuana provided to him by defendant GILBERTO HERNANDEZ, for the Bailey Organization to distribute on the block.

38. On or about August 4, 1999, defendants RUBEN RIVERA and GILBERTO HERNANDEZ, a/k/a "Papo," distributed four large dark-colored trash bags containing about sixty (60) pounds of marijuana to defendants RICARDO SANTIAGO, a/k/a "Bambe," and ENCARNACION TORRES inside 3644-48 North Lawrence Street in Philadelphia, Pennsylvania, for the Bailey Organization to distribute on the block.

39. On or about August 4, 1999, defendants RICARDO SANTIAGO, a/k/a "Bambe," and ENCARNACION TORRES transported the four large dark-colored trash bags containing about sixty (60) pounds of marijuana from 3644-48 North Lawrence Street in Philadelphia, Pennsylvania, for distribution on the block. Defendants RICARDO SANTIAGO and ENCARNACION TORRES transported the bags until police officers investigated the vehicle and confiscated the marijuana.

40. On or about August 12, 1999, defendants YOLANDA COLON, ROBERTO

CARMONA, a/k/a "Anthony," and FRANCISCO NUNEZ, a/k/a "Paquito," traveled to 610 Lindley Avenue in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

41. On or about August 25, 1999, defendants YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," and CARLOS REGALADO ROSA, a/k/a "Orlando Santana," traveled to 610 Lindley Avenue in Philadelphia, Pennsylvania, where they cut and packaged marijuana for street sales on the block.

42. On or about August 30, 1999, defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," met with defendants MOHAMED DONADO, a/k/a "Mo," and AMELED DONADO near defendant HENRY SANTANA'S home at 958 Pratt Street in Philadelphia, Pennsylvania, while defendants MOHAMED DONADO and AMELED DONADO were transporting large cardboard boxes of marijuana in a Ryder truck.

43. On or about August 30, 1999, defendants MOHAMED DONADO, a/k/a "Mo," and AMELED DONADO transported large cardboard boxes of marijuana in a Ryder truck to 5209 Akron Street in Philadelphia, Pennsylvania, the residence of defendant NORMA SANTELL.

44. On or about August 30, 1999, defendants MOHAMED DONADO, a/k/a "Mo," and AMELED DONADO retrieved four large dark-colored trash bags containing about sixty (60) pounds of marijuana from 5209 Akron Street in Philadelphia, Pennsylvania, the residence of defendant NORMA SANTELL, and placed them in a Nissan Sentra where defendant AMELED DONADO transported them until police officers stopped the vehicle and confiscated the marijuana.

45. On or about August 30, 1999, defendant NORMA SANTELL possessed with

intent to distribute the following, which she had received for storage at the direction of defendant MOHAMED DONADO, a/k/a "Mo," four large dark-colored trash bags of marijuana and four large cardboard boxes, each containing two large dark-colored trash bags of marijuana, weighing a total of about 249 pounds, inside her residence at 5209 Akron Street in Philadelphia, Pennsylvania.

46. On or about August 30, 1999, defendant MOHAMED DONADO, a/k/a "Mo," possessed with intent to distribute three one-pound plastic Ziplock bags of marijuana until police officers stopped the vehicle he was driving and confiscated the marijuana.

47. On or about September 2, 1999, defendant JUAN AMADOR, a/k/a "Johnny," supervised street sales of marijuana on the block for the Bailey Organization. AMADOR passed bundles of marijuana to street sellers and received United States currency that was the proceeds of illegal marijuana sales from the street sellers.

48. On or about September 2, 1999, within his residence at 4047 North Fairhill Street, defendant JUAN AMADOR, a/k/a "Johnny," possessed with intent to distribute on the block more than 764 small bags of cut and packaged marijuana; \$622 in United States currency that was proceeds of illegal marijuana sales; and a loaded Bryco 9 millimeter semi-automatic pistol (serial no. 1361024) to protect the marijuana and the United States currency.

49. On or about September 17, 1999, T.L. and M.C. transported about 722 pounds of marijuana to defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," for distribution to the Bailey Organization and others known and unknown to the grand jury. T.L. and M.C. transported the marijuana until they were stopped in Texas, arrested, and the marijuana was confiscated.

50. On or about September 23, 1999, defendants YOLANDA COLON,

ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Pacquito," and ALFREDO AVILES, a/k/a "June," traveled to 5869 North Marshall Street, Philadelphia, Pennsylvania, the residence of defendant CARLOS REGALADO ROSA, a/k/a "Orlando Santana," where they cut and packaged marijuana for street sales on the corner.

51. On or about September 23, 1999, defendant EDWIN CRUZ opened the block for business by tossing a small bag of cut and packaged marijuana to a street worker who sold the marijuana on the block.

52. On or about September 30, 1999, defendant ALFREDO AVILES, a/k/a "June," possessed with intent to distribute about 19.8 pounds of marijuana which he had obtained from the Bailey Organization packaging location, inside his residence at 2711 North 6th Street in Philadelphia, Pennsylvania.

53. On or about September 30, 1999, defendant CARLOS REGALADO ROSA, a/k/a "Orlando Santana," possessed with intent to distribute about 70 pounds of marijuana and the following materials for cutting and packaging marijuana inside his residence at 5869 North Marshall Street, Philadelphia, Pennsylvania: numerous ziplock bags of varying sizes, an electronic scale, several paper cutters, electric grinders/food processors, and 5 suitcases containing marijuana residue.

54. On or about September 30, 1999, defendant RICARDO SANTIAGO, a/k/a "Bambe," possessed inside his residence at 439 East Rockland Street in Philadelphia, Pennsylvania, about \$41,821 in United States currency, which was proceeds of the Bailey Organization's distribution of marijuana on the block.

55. On or about September 30, 1999, defendant HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," possessed inside his residence at 958 Pratt Street in

Philadelphia, Pennsylvania, about \$435,612 in United States currency and approximately \$57,835 in jewelry, which was proceeds of his having supplied the Bailey Organization with multi-kilogram quantities of marijuana for distribution on the block. SANTANA also possessed a 7.65 caliber Beretta handgun (serial no. A00241) inside his residence to protect the proceeds of his marijuana supply business.

56. On or about September 30, 1999 defendant MOHAMED DONADO, a/k/a "Mo," possessed inside his residence at 4424 North 7th Street in Philadelphia, Pennsylvania, a Wells Fargo ballistic vest and a Second Chance ballistic vest, to protect himself while transporting bulk quantities of marijuana to the Bailey Organization and others, both known and unknown to the grand jury.

57. On or about September 30, 1999, defendant BRIAN KEITH BAILEY, a/k/a "Keith," possessed inside his residence at 1117 Rock Creek Drive in Philadelphia, Pennsylvania, two large brown suitcases containing the marijuana residue.

58. On or about September 30, 1999 defendant BRIAN KEITH BAILEY, a/k/a "Keith," possessed inside his residence at 1 Latham Parkway in Philadelphia, Pennsylvania, two firearms, that is, a Desert Eagle .50 caliber semi-automatic handgun (serial no. 95250203) and a Mossberg 500, 20 gauge shotgun (serial no. K907506), to protect the proceeds from his marijuana distribution organization.

All in violation of Title 21, United States Code, Section 846.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 1998, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**RENEE HOPE HERRERA and
MICHAEL DI QUATTRO**

knowingly and intentionally carried firearms and aided and abetted the carrying of firearms, that is, a loaded Glock Model 19, 9 millimeter semi-automatic pistol (serial number CGR221); a loaded Glock Model 21, .45 caliber semi-automatic pistol (serial number ALY992); and a loaded Research Desert Eagle .50 caliber semi-automatic pistol (serial number 95207890) with a laser sight and scope, at Nashville, in the Middle District of Tennessee, during and in relation to a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute marijuana at Philadelphia, in the Eastern District of Pennsylvania and elsewhere, as charged in Count One of this Superseding Indictment.

In violation of Title 18, United States Code, Section 924(c).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 1998, at Philadelphia in the Eastern District of
Pennsylvania, defendants

**RENEE HOPE HERRERA and
MICHAEL DI QUATTRO**

knowingly and intentionally attempted to possess with intent to distribute and aided and abetted
the possession with intent to distribute more than 100 kilograms of marijuana, a Schedule I
controlled substance, at Nashville, in the Middle District of Tennessee.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18,
United States Code, Section 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 17, 1998, at Philadelphia in the Eastern District of Pennsylvania, defendant

HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana,"

knowingly and intentionally attempted to possess with intent to distribute and aided and abetted the possession with intent to distribute more than 100 kilograms of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 17, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana,"

knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the possession with intent to distribute more than 100 kilograms of marijuana, a schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

From in or around February 1999, to in or around June 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

OSUALDO ORTIZ, a/k/a "Cano,"

managed and controlled a building, that is, 208 West Laurel Street in Philadelphia, Pennsylvania, that he knowingly and intentionally made available for use for the purpose of unlawfully manufacturing, storing, and distributing marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

From in or around February 1999, to in or around June 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

OSUALDO ORTIZ, a/k/a "Cano,"

managed and controlled a building, that is, 208 West Laurel Street in Philadelphia, Pennsylvania, that he knowingly and intentionally made available for use for the purpose of unlawfully manufacturing, storing, and distributing marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the High School for International Affairs, a public high school, located at 1100 4th Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

From at least in or around February 1999, to on or about September 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

RICARDO SANTIAGO, a/k/a "Bambe,"

managed and controlled a building, that is 439 East Rockland Street in Philadelphia, Pennsylvania, that he knowingly and intentionally made available for use for the purpose of unlawfully manufacturing, storing, and distributing marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 4, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**RUBEN RIVERA,
GILBERTO HERNANDEZ, a/k/a "Papo,"
RICARDO SANTIAGO, a/k/a "Bambe," and
ENCARNACION TORRES**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 4, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendants

**RUBEN RIVERA,
GILBERTO HERNANDEZ, a/k/a "Papo,"
RICARDO SANTIAGO, a/k/a "Bambe," and
ENCARNACION TORRES**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance, within 1000 feet of the real property comprising the Taylor School, a public elementary school, located at 3698 Randolph Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

MOHAMED DONADO, a/k/a "Mo,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute more than 100 kilograms of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

MOHAMED DONADO, a/k/a "Mo,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute more than 100 kilograms of marijuana, a Schedule I
controlled substance, within 1000 feet of the real property comprising the McIlvain Playground,
an operational playground, located at 5200 Saul Street in Philadelphia, Pennsylvania, in
violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code,
Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania,
defendant

AMELED DONADO

knowingly and intentionally possessed with intent to distribute, and aided and abetted the
possession with intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United
States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

AMELED DONADO

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance, within 1000 feet of the real property comprising the McIlvain Playground, an operational playground, located at 5200 Saul Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

NORMA SANTELL

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute more than 100 kilograms of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

NORMA SANTELL

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute more than 100 kilograms of marijuana, a Schedule I controlled substance, within 1000 feet of the real property comprising the McIlvain Playground, an operational playground, located at 5200 Saul Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18 United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

NORMA SANTELL

managed and controlled a building, that is, 5209 Akron Street in Philadelphia, Pennsylvania,
that she knowingly and intentionally made available for use for the purpose of unlawfully
manufacturing, storing, and distributing marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

NORMA SANTELL

managed and controlled a building, that is, 5209 Akron Street in Philadelphia, Pennsylvania, that she knowingly and intentionally made available for use for the purpose of unlawfully manufacturing, storing, and distributing marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the McIlvain Playground, an operational playground, located at 5200 Saul Street, in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 856(a)(2), and Title 18, United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 1999, in the Eastern District of Pennsylvania,
defendant

JUAN AMADOR, a/k/a "Johnny,"

possessed a firearm, that is, a loaded Bryco 9 millimeter semi-automatic pistol (serial number 1361024), in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to possess with intent to distribute marijuana at Philadelphia in the Eastern District of Pennsylvania and elsewhere, as charged in Count One of this Superseding Indictment.

In violation of Title 18, United States Code, Section 924(c).

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JUAN AMADOR, a/ka "Johnny,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JUAN AMADOR, a/k/a "Johnny,"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance, within 1000 feet of the real property comprising the Alexander K. McClure Elementary School, a public elementary school, located at 600 West Hunting Avenue in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18 United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 2, 1999, at Reading, in the Eastern District of
Pennsylvania, defendant

JUAN AMADOR, a/k/a "Johnny,"

having been previously convicted in a court of the State of Pennsylvania of a crime punishable
by imprisonment for a term exceeding one year, knowingly possessed, in and affecting
commerce, a loaded Bryco 9 millimeter semi-automatic pistol (serial number 1361024).

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 21, 1999, to on or about September 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

CARLOS REGALADO ROSA, a/k/a "Orlando Santana,"

managed and controlled a building, that is 5869 North Marshall Street in Philadelphia, Pennsylvania, that he knowingly and intentionally made available for use for the purpose of unlawfully manufacturing, storing, and distributing marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 856(a)(2).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

From on or about September 21, 1999, to on or about September 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

CARLOS REGALADO ROSA, a/k/a "Orlando Santana,"

managed and controlled a building, that is, 5869 North Marshall Street in Philadelphia, Pennsylvania, that he knowingly and intentionally made available for use for the purpose of unlawfully manufacturing, storing, and distributing marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the James R. Lowell Elementary School, a public elementary school, located at 450 W. Nedro Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 856(a)(2), and Title 18 United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

COUNT TWENTY-FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFREDO AVILES, a/k/a "June"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), and Title 18 United States Code, Section 2.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about September 30, 1999, at Philadelphia, in the Eastern District of Pennsylvania, defendant

ALFREDO AVILES, a/k/a "June"

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute marijuana, a Schedule I controlled substance, within 1,000 feet of the real property comprising the Julia De Burgos School, a public middle school, located at 601 W. Lehigh Street in Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18 United States Code, Section 2.

In violation of Title 21, United States Code, Section 860.

NOTICE OF FORFEITURE

As a result of the violations of Title 21, United States Code, Sections 846 and 841,
as set forth in this indictment, defendants

**BRIAN KEITH BAILEY,
a/k/a "Keith,"
RUBEN RIVERA,
GILBERTO HERNANDEZ,
a/k/a "Papo,"
HENRY SANTANA,
a/k/a "Henry Santo,"
a/k/a "Henry Sabana,"
MOHAMED DONADO,
a/k/a "Mo,"
RENEE HOPE HERRERA,
MICHAEL DI QUATTRO,
RICARDO SANTIAGO,
a/k/a "Bambe,"
ENCARNACION TORRES,
EDWIN CRUZ,
JUAN AMADOR,
a/k/a "Johnny,"
WILLIAM KING,
MIGUEL BERDECIA,
a/k/a "Colombia,"
YOLANDA COLON,
ROBERTO CARMONA,
a/k/a "Anthony,"
FRANCISCO NUNEZ,
a/k/a "Paquito,"
SHARON BAILEY,
CARLOS REGALADO ROSA,
a/k/a "Orlando Santana,"
ALFREDO AVILES,
a/k/a "June,"
OSUALDO ORTIZ,
a/k/a "Cano,"
AMELED DONADO, and
NORMA SANTELL**

shall forfeit to the United States of America pursuant to Title 21, United States Code, Section

853, the following property:

A. All property derived from any proceeds which defendants BRIAN K. BAILEY, a/k/a "Keith," RUBEN RIVERA, GILBERTO HERNANDEZ, a/k/a "Papo," HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," MOHAMED DONADO, a/k/a "Mo," RENEE HOPE HERRERA, MICHAEL DI QUATTRO, RICARDO SANTIAGO, a/k/a "Bambe," ENCARNACION TORRES, EDWIN CRUZ, JUAN AMADOR, a/k/a "Johnny," WILLIAM KING, MIGUEL BERDECIA, a/k/a "Colombia," YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," SHARON BAILEY, CARLOS REGALADO ROSA, a/k/a "Orlando Santana," ALFREDO AVILES, a/k/a "June," OSUALDO ORTIZ, a/k/a "Cano," AMELED DONADO, and NORMA SANTELL obtained, directly or indirectly, as a result of these violations of Title 21 as charged in this indictment, including, but not limited to, \$10,000,000, and further including, but not limited to:

1117 Rock Creek Drive, Wyncote, Pennsylvania,
1462 Thornberry Drive, Wyncote, Pennsylvania,
1 Latham Parkway, Cheltenham, Pennsylvania,
4000-02 North 5th Street, Philadelphia, Pennsylvania,
Pennsylvania Liquor License #R171, owned by Brian Bailey, Inc.,
New Dutch Garden Bar
6919 North 19th Street, Philadelphia, Pennsylvania,
4224 North American Street, Philadelphia, Pennsylvania,
3638-3642 North Lawrence Street, Philadelphia, Pennsylvania,
958 Pratt Street, Philadelphia, Pennsylvania,

\$2,061.75 in United States currency seized from 4000 North 5th Street, Philadelphia, Pennsylvania, on September 30, 1999;
\$1,801 in United States currency seized from 4224 North America Street, Philadelphia, Pennsylvania, on September 30, 1999;
\$41,820 in United States currency seized from 439 East Rockland Street, Philadelphia, Pennsylvania, on September 30, 1999;
\$435.612 in United States currency seized from 958 Pratt Street, Philadelphia, Pennsylvania, on September 30, 1999;
Assorted jewelry (approximately value \$57,835) seized from 958 Pratt Street, Philadelphia, Pennsylvania, on September 30, 1999.

B. All property owned by defendants BRIAN KEITH BAILEY, a/k/a "Keith," RUBEN RIVERA, GILBERTO HERNANDEZ, a/k/a "Papo," HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," MOHAMED DONADO, a/k/a "Mo," RENEE HOPE HERRERA, MICHAEL DI QUATTRO, RICARDO SANTIAGO, a/k/a "Bambe," ENCARNACION TORRES, EDWIN CRUZ, JUAN AMADOR, a/k/a "Johnny," WILLIAM KING, MIGUEL BERDECIA, a/k/a "Colombia," YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Pacquito," SHARON BAILEY, CARLOS REGALADO ROSA, a/k/a "Orlando Santana," ALFREDO AVILES, a/k/a "June," OSUALDO ORTIZ, a/k/a "Cano," AMELED DONADO, and NORMA SANTELL which was used or intended to be used in any manner or part to commit or facilitate the commission of any of these violations, including, but not limited to:

1117 Rock Creek Drive, Wyncote, Pennsylvania,
1462 Thornberry Drive, Wyncote, Pennsylvania,
1 Latham Parkway, Cheltenham, Pennsylvania,
4000-02 North 5th Street, Philadelphia, Pennsylvania,
Pennsylvania Liquor License #R171, owned by Brian Bailey, Inc.,
New Dutch Garden Bar
6919 North 19th Street, Philadelphia, Pennsylvania,
4224 North American Street, Philadelphia, Pennsylvania,
3638-3642 North Lawrence Street, Philadelphia, Pennsylvania,
958 Pratt Street, Philadelphia, Pennsylvania,

\$2,061.75 in United States currency seized from 4000 North 5th Street, Philadelphia, Pennsylvania, on September 30, 1999;
\$1,801 in United States currency seized from 4224 North America Street, Philadelphia, Pennsylvania, on September 30, 1999;
\$41,820 in United States currency seized from 439 East Rockland Street, Philadelphia, Pennsylvania, on September 30, 1999;
\$435.612 in United States currency seized from 958 Pratt Street, Philadelphia, Pennsylvania, on September 30, 1999;
Assorted jewelry (approximately value \$57,835) seized from 958 Pratt Street, Philadelphia, Pennsylvania, on September 30, 1999
One Beretta Model 70 handgun 7.65 caliber (serial no.

One Mossberg 12 gauge shotgun (serial no. P295487)
One Interarms 9 millimeter pistol (serial no. 2171974)
One Desert Eagle .50 caliber semi-automatic handgun (serial no. 95259293);
One Mossberg 500 20 gauge shotgun (serial no. K907506);
One Smith & Wesson revolver with miscellaneous ammunition (serial no. AL90060);
One Bryco 9 millimeter semi-automatic pistol (serial no. 1361024);
One Glock Model 19, 9 millimeter semi-automatic pistol (serial no. CGR221);
One Glock Model 21 .45 caliber semi-automatic pistol (serial no. ALY992);
One Research Desert Eagle .50 caliber semi-automatic pistol (serial no. 95207890)

C. If any of the property being subject to forfeiture, as a result of any act or omission of the defendants BRIAN KEITH BAILEY, a/k/a "Keith," RUBEN RIVERA, GILBERTO HERNANDEZ, a/k/a "Papo," HENRY SANTANA, a/k/a "Henry Santo," a/k/a "Henry Sabana," MOHAMED DONADO, a/k/a "Mo," RENEE HOPE HERRERA, MICHAEL DI QUATTRO, RICARDO SANTIAGO, a/k/a "Bambe," ENCARNACION TORRES, EDWIN CRUZ, JUAN AMADOR, a/k/a "Johnny," WILLIAM KING, MIGUEL BERDECIA, a/k/a "Colombia," YOLANDA COLON, ROBERTO CARMONA, a/k/a "Anthony," FRANCISCO NUNEZ, a/k/a "Paquito," SHARON BAILEY, CARLOS REGALADO ROSA, a/k/a "Orlando Santana," ALFREDO AVILES, a/k/a "June," OSUALDO ORTIZ, a/k/a "Cano," AMELED DONADO, and NORMA SANTELL

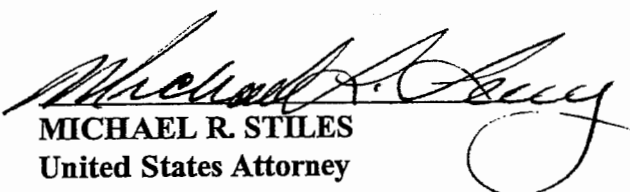
1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All pursuant to Title 21, United States Code, Section 853(a)(1), (2) and (p).


FOREPERSON


MICHAEL R. STILES
United States Attorney

First Assistant U.S. Attorney